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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91179480
Party	Plaintiff Plasti-Fab Ltd.
Correspondence Address	David E. Sipiora Townsend and Townsend and Crew LLP 1200 17th Street, Suite 2700 Denver, CO 80202 UNITED STATES denverteas@townsend.com
Submission	Motion to Extend
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Date	05/30/2008
Attachments	GEOSPEC_motiontoextend.pdf (3 pages)(75525 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re: *Application Ser. No. 79/023,935*
Published: August 7, 2007, in the Official Gazette
Applicant: Kobelco Construction Machinery Co., Ltd.
Mark: **GEOSPEC**

PLASTI-FAB LTD.,

Opposer,

vs.

KOBELCO CONSTRUCTION
MACHINERY CO., LTD.,

Applicant.

Opposition No. 91179480

**OPPOSER'S MOTION TO EXTEND
DISCOVERY AND TRIAL DATES**

Opposer hereby moves to extend for sixty (60) days the discovery and trial dates set in the above-entitled matter, whereby the respective periods for taking action will be as follows:

Discovery to close:	July 29, 2008
Testimony period for party in position of plaintiff to close (opening thirty days prior thereto)	October 27, 2008
Testimony period for party in position of defendant to close (opening thirty days prior thereto)	December 26, 2008
Rebuttal testimony period to close (opening fifteen days prior thereto)	February 9, 2009

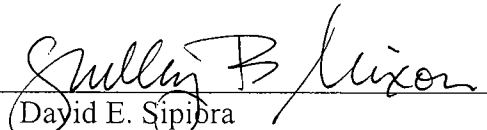
Opposer has good cause to request this extension of time. TBMP §509. Opposer and Applicant have been exploring settlement and need additional time in which to determine whether settlement is possible. Opposer is hopeful that the parties will be successful in avoiding protracted TTAB litigation and respectfully requests that the discovery and trial dates be moved as set forth herein. Opposer attempted to obtain consent to extend the discovery and trial dates in the present case; however, despite contacting counsel for Applicant no fewer than three times, Opposer was unable to elicit a response from counsel for Applicant. Accordingly, the present motion is being filed unilaterally.

Respectfully submitted,

TOWNSEND AND TOWNSEND AND CREW LLP

Date: May 30, 2008

By




David E. Sipibra
Shelley B. Nixon
Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2008, I served the foregoing **OPPOSER'S MOTION TO EXTEND DISCOVERY AND TRIAL DATES** on counsel for Applicant by depositing a true and correct copy of the same with the United States Postal Service, first class mail, postage prepaid, in an envelope addressed to:

Bassam N. Ibrahim
Buchanan Ingersoll & Rooney PC
1737 King Street, Suite 500
Alexandria, Virginia 22314-2727



Carrie M. Oliver

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